

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

v.

*

SECTION:

STEPHEN FARRELL

*

VIOLATION: 18 U.S.C. §228(a)(1)

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of agents from the Office of Inspector General, Health and Human Services and others, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant, **STEPHEN FARRELL**.

Competent testimony and admissible exhibits would be introduced to show that the defendant, **STEPHEN FARRELL**, was the biological father of two children with Tammy Farrell Dardar: Ashley Farrell (DOB: 6/16/87) and Stephen Farrell, Jr. (DOB: 9/6/89), both of whom resided in Harahan, Louisiana. Exhibits and testimony would be admitted to prove that **STEPHEN FARRELL** and Tammy Farrell Dardar were divorced on March 1, 1994, in the 24th Judicial District of Louisiana, within the Eastern District of Louisiana.

Competent testimony and tangible exhibits would be introduced to further prove that in the course of his divorce proceeding, **STEPHEN FARRELL** was ordered by the 24th Judicial District of Louisiana to pay \$940.00 per month in child support to his former wife, Tammy Farrell Dardar. Exhibits and testimony would also be introduced to prove that save for a few sporadic payments, Tammy Farrell Dardar stopped receiving child support payments from **STEPHEN FARRELL** in January 1999.

Testimony and exhibits, including tax and employment records, would also be introduced to prove that in the period of time between January 1999 and September 6, 2007, the date upon which his youngest child reached the age of eighteen (18), the defendant, **STEPHEN FARRELL**, lived outside of the state of Louisiana, and reported income derived from diverse states, including Mississippi, Texas, Florida, South Carolina, Virginia, and Ohio.

Further testimony would be introduced to prove that the defendant, **STEPHEN FARRELL**, lived outside of the State of Louisiana, willfully failed to pay a court-ordered support obligation with respect to his daughter, Ashley Farrell, and son, Stephen Farrell, Jr. Testimony and exhibits, including bank records, court orders, and other documentation would be introduced to prove that on September 6, 2007 the defendant owed \$128,599.60 in child support payments. Finally,

testimony and exhibits would be introduced to prove that the defendant, **STEPHEN FARRELL**, lived outside of the State of Louisiana for a period of time greater than one (1) year.

READ AND APPROVED:

Louis Champagne (Date)
Counsel for STEPHEN FARRELL

STEPHEN FARRELL (Date)
Defendant

DANIEL P. FRIEL (Date)
Assistant U.S. Attorney